

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of

Section 68.4(a) of the Commission's Rules)
Governing Hearing Aid-Compatible Telephones) WT Docket No. 06-203

Reply Comments of the
Alexander Graham Bell Association for the Deaf and Hard of Hearing

The Alexander Graham Bell Association for the Deaf and Hard of Hearing (AG Bell) submits reply comments in the above captioned proceedings. AG Bell joined in support of the Hearing Loss Association of America's (HLAA) comments to the Wireless Telecommunications Bureau Public Notice released on November 8, 2006.

AG Bell continues its participation and support of the efforts of HLAA and Gallaudet University Technology Access Program (TAP) in negotiating the important issues under consideration with manufacturers and wireless carriers regarding HAC requirements and in good faith agrees to the HAC Principles as listed.

AG Bell acknowledges the industry's concerns regarding product and compatibility design as well as other issues under deliberation. AG Bell, on behalf of its consumer membership, supports: 1) seeking the status on testing and labeling of hearing aids by the FDA due to usability and immunity issues of wireless devices, 2) the 2007 version of ANSI C63.19 with adjusted signal to noise ratio for telecoil compatibility when approved by ANSI as requested to the FCC by TAP of Gallaudet University, 3) seeking further clarifying information from industry on efforts to overcome technical barriers, complications and challenges on product design and compatibility.

HAC Principles-Final-January 30, 2007
AISP.4-HAC WG10 and Consumers

- (1) The wireless industry and advocates for consumers with hearing aids are continuing to work together to address concerns of wireless consumers with

hearing aids. All parties agree that recommendations for specific FCC rule changes regarding numbers of HAC devices are premature and cannot be included in reply comments based on the on-going dialogue. Such recommendations will be filed in the near future either as a single agreement or in separate filings.

- (2) The ongoing dialogue between the wireless industry and advocates for consumers with hearing aids has been valuable and has afforded all parties with opportunities to better understand each others' needs and concerns. The wireless industry better understands the needs of consumers with hearing aids in terms of the types of devices and services that are desired for making and receiving calls. Advocates for consumers with hearing aids better understand the technical challenges and operational complexities underlying the offering of HAC devices and services.
- (3) HAC wireless devices should support US bands. Design changes for HAC should not diminish the overall performance of the devices.
- (4) In achieving an appropriate balance between consumers with hearing aids and technical challenges faced by the wireless industry, the FCC's HAC requirements beginning in 2008 may need to be revised to reflect a reduction in the required minimum number of M-rated devices accompanied by an increase in the required minimum number of T-rated devices.
- (5) Notwithstanding the benchmarks and minimum requirements set forth in number (4) above, it is understood that the wireless industry has an obligation to incorporate HAC wherever readily achievable.
- (6) The wireless industry is committed to offering all consumers, including those who wear hearing aids, a broad array of handset devices and services. Tier 1 service providers agree to include in their annual reports to the FCC information on product "tiering" of HAC wireless devices available to consumers.
- (7) The wireless industry and advocates for consumers with hearing aids agree there is a need to regularly "refresh" offerings of HAC devices. New technologies should also incorporate FCC HAC requirements to reflect advancements available in the mass market.
- (8) The wireless industry and advocates for consumers with hearing aids agree that there should be a review of HAC milestones at a future date.

Respectively submitted,

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January 31, 2007